

BROWNSTEIN HYATT FARBER SCHRECK, LLP
5371 Kietzke Lane
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1 Adam P. McMillen, Bar No. 10678
2 amcmillen@bhfs.com
3 BROWNSTEIN HYATT FARBER SCHRECK, LLP
4 5371 Kietzke Lane,
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8 Attorney for Plaintiff JED MARGOLIN

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2015 DEC 28 PM 3:20
SUSAN MERRIWETHER
V. Alegria LERK
BY _____ DEPUTY

8 IN THE FIRST JUDICIAL COURT OF THE STATE OF NEVADA
9 IN AND FOR CARSON CITY

11 JED MARGOLIN, an individual,
12 Plaintiff,

CASE NO.: 090C00579 1B

DEPT NO.: 1

13 v.

**OPPOSITION TO MOTION TO
WITHDRAW AS COUNSEL**

14 OPTIMA TECHNOLOGY
15 CORPORATION, a California
16 corporation, OPTIMA TECHNOLOGY
17 CORPORATION, a Nevada corporation,
18 REZA ZANDIAN aka GOLAMREZA
19 ZANDIANJAZI aka GHOLAM REZA
20 ZANDIAN aka REZA JAZI aka J. REZA
21 JAZI aka G. REZA JAZI aka
22 GHONOREZA ZANDIAN JAZI, an
23 individual, DOES Companies 1-10, DOE
24 Corporations 11-20, and DOE Individuals
25 21-30,
26 Defendants.

21 COMES NOW Plaintiff, Jed Margolin, by and through undersigned counsel of record,
22 Adam P. McMillen of Brownstein Hyatt Farber Schreck, and files this opposition to Severin A.
23 Carlson, Tara C. Zimmerman and Kaempfer Crowell's Motion to Withdraw as Counsel for
24 Defendant Reza Zandian aka Golamreza Zandianjazi aka Gholam Reza Zandian aka Reza Jazi
25 aka J. Reza Jazi aka G. Reza Jazi aka Ghononreza Zandian Jazi ("Zandian").

27 This opposition is made and based upon the following points and authorities, the papers
28 and pleadings on file herein and any other information or oral argument the Court entertains.

055457\0001\14288470.1

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. Facts**

3 On March 14, 2012, John Peter Lee filed an amended motion to withdraw as counsel for
4 Zandian and provided the Court and counsel with Zandian's last known address in San Diego.

5 On April 26, 2012, the Court granted John Peter Lee's motion to withdraw.

6
7 Thereafter, Zandian failed to respond to discovery or any other papers or pleadings in this
8 matter. As a result, on June 24, 2013, a default judgment was entered against Zandian. On
9 December 20, 2012, Zandian filed a motion to set aside the default judgment and a notice of
10 appearance of new counsel (Johnathon Fayeghi, Esq., of the law firm Hawkins Melendrez P.C.).

11 On February 6, 2014, the Court denied the motion to set aside the default judgment.

12 On February 2, 2014, Plaintiff Jed Margolin filed a motion for order to show cause
13 regarding contempt for Zandian's willful violation of the Court's January 13, 2014 Order granting
14 Plaintiff's motion for debtor examination and to produce documents. On February 21, 2014,
15 Zandian filed a substitution of counsel, substituting in the law firm Kaempfer Crowell for
16 Hawkins Melendrez. On March 12, 2014, Zandian filed a notice of appeal regarding the Court's
17 order denying the motion to set aside the default judgment. On March 17, 2014, the Court filed
18 an order denying the request for submission of the motion for order to show cause and stated that
19 the Court was divested of jurisdiction due to Zandian filing a notice of appeal regarding this
20 Court's order related to the default judgment.

21
22 On June 10, 2015, Plaintiff filed another motion for debtor's examination and to produce
23 documents. On October 19, 2015, the Supreme Court affirmed this Court's orders regarding the
24 default judgment. On November 6, 2015, after a hearing on the matter, the Court granted the
25 motion for debtor's examination and to produce documents. In the November 6, 2015 order, the
26 Court ordered Zandian to appear in San Diego, California, for a debtor's examination during the
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28

1 month of February, 2016. The Court also ordered Zandian to produce documents regarding
2 Zandian’s financial information on or before December 21, 2015.

3 On December 10, 2015, Zandian’s counsel filed the current motion to withdraw as
4 counsel. Counsel provides two reasons for the motion to withdraw. The first stated reason is that
5 Zandian has substantially failed to fulfill his obligations to his counsel and further representation
6 would be a financial burden on counsel. See Motion to Withdraw at 3:1-6. The second stated
7 reason is that Zandian “insists upon taking action that the lawyer considers repugnant or with
8 which the lawyer has fundamental disagreement.” See *id.* at 3:7-9. There is no explanation as to
9 what action counsel considers repugnant or with which he has a fundamental disagreement.

11 Counsel also provided two last known addresses of Zandian: one in Paris, France, and one
12 in Santa Ana, California. See *id.* at 4:9-14. The Santa Ana address was associated with “Reza
13 Zandian” and the French address was associated with “Gholam Reza Zandian Jazi.” See *id.*

15 Also on December 10, 2015, Zandian filed a notice of appeal of the order granting
16 Plaintiff’s motion for debtor examination and to produce documents.

17 On December 15, 2015, Zandian’s counsel filed an errata to their motion to withdraw
18 stating that Zandian “resides in France” and indicated that the Santa Ana, California, address
19 belongs to Reza Zandian’s son, Alborz Zandian.

21 On December 16, 2015, Zandian’s counsel filed a motion to withdraw as counsel for
22 “Appellant Reza Zandian” in the Nevada Supreme Court. See Exhibit 1. The reasons given for
23 that motion to withdraw are that Zandian has failed to fulfill his obligations and that further
24 representation would result in an unreasonable financial burden on counsel. *Id.* In addition,
25 counsel represents that Zandian insists on taking action that his counsel “considers repugnant or
26 with which counsel has fundamental disagreement.” *Id.* Further, counsel represents that when
27 Zandian was informed of the November 6, 2015, order regarding the debtor’s examination and to
28

1 produce documents, Zandian “advised Carlson that he wished to pursue the instant appeal of the
2 November 6 Order.” Id. Counsel then states that he agreed to file the appeal “solely for the
3 purpose of preserving Appellant’s appeal.” Id. As in the present motion to withdraw, counsel
4 fails to explain what it is that counsel finds repugnant or with which counsel has a fundamental
5 disagreement.

6
7 **II. Legal standard**

8 “While a party may discharge his attorney with or without cause, *Morse v. District Court*,
9 65 Nev. 275, 195 P.2d 199 (1948), with few limitations, the attorney should not withdraw from a
10 case except for good cause.” *Matter of Kaufman*, 93 Nev. 452, 456, 567 P.2d 957, 959-60 (1977)
11 (citing *Page v. Walser*, 46 Nev. 390, 213 P. 107 (1923); *Eisenberg v. Brand, et al.*, 144 Misc.
12 878, 259 N.Y.S. 57 (1932)). “Except for good cause shown, no application for withdrawal or
13 substitution shall be granted if a delay of the trial or of the hearing or any other matter in the case
14 would result. Discharge of an attorney may not be grounds to delay a trial or other hearing.”
15 FJDCR 22(4) (emphasis added). “When ordered to do so by a tribunal, a lawyer shall continue
16 representation notwithstanding good cause for terminating the representation.” NRPC 1.16(c)
17 (emphasis added).
18

19 **III. Allowing counsel to withdraw will delay the production of documents and the**
20 **debtor’s examination that were ordered by this Court on November 6, 2015.**

21
22 Notwithstanding any potential good cause, allowing counsel to withdraw will delay the
23 debtor’s examination and the production of documents that were ordered by this Court on
24 November 6, 2015. The documents were ordered to be produced on or before December 21,
25 2015. The debtor’s examination was ordered to take place in February, 2016. The motion to
26 withdraw comes immediately before the deadline to produce documents and shortly before the
27 debtor’s examination. If counsel is allowed to withdraw now, these items will be unnecessarily
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1 delayed and Plaintiff will be highly prejudiced thereby. In addition, a delay in these proceedings
2 will give Zandian time to hide or dispose of assets.

3 **IV. Zandian’s last two addresses appear to be unreliable**

4 At the core of Zandian’s appeal of this Court’s denial of the Motion to Set Aside the
5 Default Judgment was his counsel’s (Kaempfer Crowell’s) assertion that it was not reasonable for
6 Plaintiff or the Court to rely on the address that John Peter Lee (Zandian’s first Counsel) provided
7 when he withdrew. Now counsel is leaving two addresses for Zandian in its motion to withdraw,
8 one in France and one in Santa Ana, California. Counsel provided a different alias for Zandian
9 for each address as well. Counsel also indicates that Zandian resides in France and that the Santa
10 Ana address is for Zandian’s son, Alborz. Another problem is that Zandian’s French residency
11 permit expired on August 5, 2015. See Exhibit 2 (“Est autorise(e) a prolonger provisoirement son
12 sejour en france jusqu' au 05/08/2015” which translates to English as, “Is authorized to
13 temporarily extend his stay in France until 05/08/2015”). Therefore, it appears that the addresses
14 that counsel has provided are unreliable and would not allow Plaintiff and the Court to provide
15 notice to Zandian of the proceedings herein. This unreliability provides another basis for not
16 allowing counsel to withdraw.

17 In addition, according to FJDCR 22(3), if an attorney withdraws, the attorney must
18 provide an “address at which the party is to be served with notice of all further proceedings.”
19 Also, SCR 47, when an attorney withdraws another attorney must be appointed or the party must
20 appear in person. Given the unreliability of the addresses provided to the Court and given
21 Zandian’s history with this case, it would appear that if counsel is permitted to withdraw, Zandian
22 will ignore this matter and execution of the judgment will be delayed and Plaintiff will be greatly
23 prejudiced thereby and Zandian will make a mockery of this Court and its orders.

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V. Counsel has not established good cause

Counsel has not explained how Zandian has failed to fulfill his obligations or what action Zandian wants to take or that he might have already taken that counsel finds repugnant or with which counsel has a fundamental disagreement. Counsel should be compelled to disclose the actual reasons for the motion to withdraw so that the Court can properly weigh the evidence to determine the propriety of withdrawal. Without providing the basis therefore, there cannot be good cause to withdraw.

VI. Conclusion


Based upon the above, counsel's motion to withdraw should be denied. If the Court is in any way inclined to grant the motion, Plaintiff requests an order from the Court requiring Zandian to confirm an address, before any withdrawal, whereby Plaintiff and the Court can communicate regarding this matter with Zandian.

AFFIRMATION

Pursuant to NRS 239B.030, the undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

DATED: December 28 2015.

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By:  6978 for: _____
Adam P. McMillen
5371 Kietzke Lane
Reno, Nevada 89511
Attorneys for Plaintiff JED MARGOLIN

BROWNSTEIN HYATT FARBER SCHRECK, LLP

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Reno, Nevada 89511
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CERTIFICATE OF SERVICE

Pursuant to NRC 5(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and on this 28th day of December, 2015, I served the foregoing document entitled **OPPOSITION TO MOTION TO WITHDRAW AS COUNSEL** via first class mail, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Reno, Nevada for delivery the following:

Severin A. Carlson
Tara C. Zimmerman
Kaempfer Crowell
510 West Fourth Street
Carson City, Nevada 89703

DATED: December 28, 2015

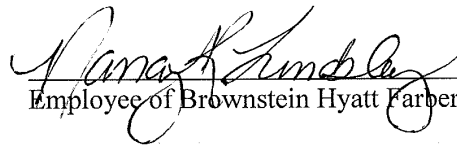

Employee of Brownstein Hyatt Farber Schreck, LLP

Exhibit 1

Exhibit 1

IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed
Dec 16 2015 08:43 a.m.

Tracie K. Lindeman
Clerk of Supreme Court
Nevada Supreme Court
Case No. 69372

REZA ZANDIAN A/K/A GOLAMREZA
ZANDIANJAZI A/K/A GHOLAM REZA
ZANDIAN A/K/A REZA JAZI A/K/A J.
REZA JAZI A/K/A G. REZA JAZI A/K/A
GHONOREZA ZANDIAN JAZI, an
individual,

Appellant,

vs.

JED MARGOLIN, an individual,

Respondent.

**MOTION TO WITHDRAW AS COUNSEL
FOR APPELLANT REZA ZANDIAN**

Severin A. Carlson (“Carlson”), Tara C. Zimmerman (“Zimmerman”) and Kaempfer Crowell (collectively “Counsel”), counsel for Appellant REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka GHONONREZA ZANDIAN JAZI (“Appellant”), pursuant to Supreme Court Rule (“SCR”) 46 and Nevada Rule of Professional Conduct (“NRPC”) 1.16, move this Court for an order granting Counsel’s motion to withdraw as counsel of record in this matter.

This motion is made based upon the following Points and Authorities and the Affidavit of Severin A. Carlson, attached hereto as **Exhibit 1**.

MEMORANDUM OF POINTS AND AUTHORITIES

I. FACTUAL BACKGROUND

Kaempfer Crowell entered an appearance in the First Judicial District Court on behalf of Appellant on or about March 3, 2014, to, among other things, seek to set aside orders of the District Court that had been entered against Appellant, directly and via appeals to this Court.

The District Court, in its November 6, 2015 Order Granting Plaintiff's Motion for Debtor Examination and to Produce Documents (the "November 6 Order"), attached hereto as **Exhibit 2**, ordered Appellant to produce to counsel for Respondent JED MARGOLIN ("Respondent"), on or before December 21, 2015, various information and documents as set forth in the November 6 Order. The November 6 Order also directed Appellant to appear for a judgment debtor examination at a location to be specified by Respondent's counsel in San Diego, California in February 2016.

Thereafter, Carlson advised Appellant that Counsel would be seeking to withdraw in the District Court proceedings unless Appellant's obligations were fulfilled. At that time, Appellant advised Carlson that he wished to pursue the instant appeal of the November 6 Order. Given the approaching

deadline for filing an appeal, Carlson agreed to file the Notice of Appeal and Case Appeal Statement with the First Judicial District Court on Appellant's behalf, solely for the purpose of preserving Appellant's appeal. Carlson advised Appellant that Counsel would be seeking to withdraw in both the District Court and Nevada Supreme Court proceedings immediately thereafter. Counsel filed a Motion to Withdraw as Counsel in the District Court proceedings on December 10, 2015, the same day the Notice of Appeal was filed.

During Counsel's representation, Appellant has substantially failed to fulfill his obligations to Counsel regarding their services, despite Appellant having been given reasonable warning that Counsel would withdraw unless the obligations were fulfilled. Further representation would result in an unreasonable financial burden on Counsel. The representation has also been rendered unreasonably difficult as a result of Appellant's failure to meet his obligations to Counsel.

Furthermore, Appellant insists upon taking action that Counsel considers repugnant or with which Counsel has fundamental disagreement, therefore making the immediate request to withdraw reasonable.

./././

./././

II. ANALYSIS

Rule 1.16(b)(5) of the Nevada Rules of Professional Conduct provides that an attorney may withdraw from representing a client if “[t]he client fails substantially to fulfill an obligation to the lawyer regarding the lawyer’s services and has been given a reasonable warning that the lawyer will withdraw unless the obligation is fulfilled.”

Rule 1.16(b)(4) of the Nevada Rules of Professional Conduct provides that an attorney may withdraw from representing a client if “[a] client insists upon taking action that the lawyer considers to be repugnant or with which the lawyer has a fundamental disagreement.” Furthermore, SCR 46 provides:

The attorney in an action or special proceeding may be changed at any time before judgment or final determination as follows:

- (2) Upon the order of the court or judge thereof on the application of the attorney or the client.

In this case, Appellant has not only substantially failed to fulfill his obligations to Counsel regarding their services, but also insists upon taking action that Counsel considers to be repugnant or with which Counsel has a fundamental disagreement. Consequently, Counsel hereby request that the Court issue an order allowing withdrawal as Appellant’s counsel.

/./././

As set forth in the attached Affidavit of Severin A. Carlson, and based upon information and belief, the last known addresses of Appellant are as follows:

Gholam Reza Zandian Jazi
6 rue Edouard Fournier
75116 Paris
France

Reza Zandian
c/o Alborz Zandian
9 MacArthur Place, Unit 2105
Santa Ana, California 92707-6753

rezazand@hotmail.com

This Motion will be served upon Appellant. No judgment or final determination has been filed in this case other than those previously ordered by the District Court and upheld by this Court.

Counsel has complied with all requirements to withdraw as counsel of record. As such, an order allowing Counsel to withdraw is appropriate. Appellant has been provided a copy of the District Court's November 6 Order, after having been informed of the District Court's ruling from the bench, and therefore is readily aware of the deadlines and requirements set forth in the November 6 Order. Appellant has also been advised of the deadlines before this Court, including this Court's assignment of this case to the Mandatory Settlement Program.

III. CONCLUSION

For the reasons stated above, Counsel request an order of this Court allowing them to withdraw as counsel of record for Appellant in this action.

DATED this 15th day of December, 2015.

KAEMPFER CROWELL

BY: 

SEVERIN A. CARLSON
Nevada Bar No. 9373
TARA C. ZIMMERMAN
Nevada Bar No. 12146
510 West Fourth Street
Carson City, Nevada 89703
Attorneys for Appellant

CERTIFICATE OF SERVICE

Pursuant to NRAP 25(d), I, the undersigned, hereby certify that on the 15th day of December, 2015, I caused the foregoing **MOTION TO WITHDRAW AS COUNSEL FOR APPELLANT REZA ZANDIAN** to be served this date by depositing a true copy of the same for mailing at Reno, Nevada, first class postage fully prepaid and addressed to:

Matthew D. Francis, Esq.
Adam P. McMillen, Esq.
Watson Rounds
5371 Kietzke Lane
Reno, Nevada 89511
775.324.4100
775.333.8171 - facsimile
Attorneys for Respondent

Reza Zandian
c/o Alborz Zandian
9 MacArthur Place, Unit 2105
Santa Ana, California 92707-6753
Appellant

Gholam Reza Zandian Jazi
6 rue Edouard Fournier
75116 Paris
France
Appellant

I also caused the foregoing Motion to be served this date by e-mail to Appellant as follows:

rezazand@hotmail.com



an employee of Kaempfer Crowell

EXHIBIT 1

EXHIBIT 1

IN THE SUPREME COURT OF THE STATE OF NEVADA

REZA ZANDIAN A/K/A GOLAMREZA
ZANDIANJAZI A/K/A GHOLAM REZA
ZANDIAN A/K/A REZA JAZI A/K/A J.
REZA JAZI A/K/A G. REZA JAZI A/K/A
GHONOREZA ZANDIAN JAZI, an
individual,

Appellant,

vs.

JED MARGOLIN, an individual,

Respondent.

**Nevada Supreme Court
Case No. 69372**

**AFFIDAVIT OF SEVERIN A. CARLSON IN SUPPORT OF
MOTION TO WITHDRAW AS COUNSEL
FOR APPELLANT REZA ZANDIAN**

STATE OF NEVADA)
) ss.
COUNTY OF WASHOE)

1. I am duly licensed to practice law in the State of Nevada and am a partner at the law firm of Kaempfer Crowell, as well as counsel for Appellant REZA ZANDIAN (“Appellant”) in the above-entitled matter.

./././

./././

2. I have personal knowledge of the facts stated herein, except for those stated upon information and belief and, as to those, I believe them to be true.

3. I make this Affidavit in support of Kaempfer Crowell's Motion to Withdraw as Counsel for Appellant.

4. Continued representation of Appellant will result in an unreasonable financial burden on Kaempfer Crowell and the representation has been rendered unreasonably difficult.

5. Appellant has been repeatedly reminded of his obligations to Kaempfer Crowell and that failure to meet those obligations could result in Kaempfer Crowell withdrawing as counsel of record.

6. Appellant continues to have substantial outstanding obligations to Kaempfer Crowell that remain unrectified.

7. Despite repeated attempts to counsel Appellant, Appellant insists upon taking action that Kaempfer Crowell and I consider to be repugnant or with which we have a fundamental disagreement.

8. Appellant's current mailing address on file with this office, as well as all other known possible addresses are:

Gholam Reza Zandian Jazi
6 rue Edouard Fournier
75116 Paris
France

Reza Zandian
c/o Alborz Zandian
9 MacArthur Place, Unit 2105
Santa Ana, California 92707-6753

rezazand@hotmail.com

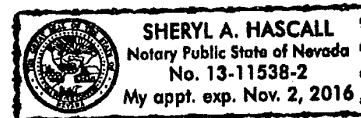
8. That in light of the above, I believe an order allowing Kaempfer Crowell to withdraw from representation in this matter is appropriate and that such withdrawal complies with the applicable rules of professional conduct, Nevada Supreme Court Rules, and Nevada Rules of Appellate Procedure.


FURTHER YOUR AFFLIANT SAYETH NAUGHT.

DATED this 15th day of December, 2015.


SEVERIN A. CARLSON

Subscribed and Sworn to before me
this 15th day of December, 2015, by
Severin A. Carlson.




NOTARY PUBLIC

My Commission Expires: 11/2/2016

EXHIBIT 2

EXHIBIT 2

1 Case No. 09 0C 00579 1B

2 Dept. No. I

REC'D & FILED

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SUSAN MERRIWETHER

CLERK

3
4
5 In The First Judicial District Court of the State of Nevada

6 In and for Carson City

7 JED MARGOLIN, an individual,

8 Plaintiff,

9 vs.

10 OPTIMA TECHNOLOGY CORPORATION,
11 a California corporation, OPTIMA
12 TECHNOLOGY CORPORATION, a Nevada
13 corporation, REZA ZANDIAN
14 aka GOLAMREZA ZANDIANJAZI
15 aka GHOLAM REZA ZANDIAN
16 aka REZA JAZI aka J. REZA JAZI
17 aka G. REZA JAZI aka GHONONREZA
18 ZANDIAN JAZI, an individual, DOE Companies
19 1-10, DOE Corporations 11-20, and DOE
20 Individuals 21-30,

21 Defendants.

**ORDER GRANTING PLAINTIFF'S
MOTION FOR DEBTOR
EXAMINATION AND TO
PRODUCE DOCUMENTS**

22 This matter comes before the Court on Plaintiff Jed Margolin's Motion for Debtor
23 Examination and to Produce Documents, filed on June 10, 2015. On June 29, 2015, Defendant
24 Reza Zandian filed an Opposition and a Motion for Protective Order. On July 10, 2015,
25 Plaintiff filed a Reply in Support of the Motion for Debtor Examination and to Produce
26 Documents and an Opposition to Defendant's Motion for Protective Order. On July 20, 2015,
27 Defendant filed his Reply in Support of the Motion for Protective Order. On November 5,
28 2015, the Court held oral argument on the motions.

1 After considering the motions, oppositions, replies, oral argument and the papers and
2 pleadings on file herein, for good cause appearing, the Court hereby grants the Motion for
3 Debtor's Examination and to Produce Documents.

4 The Court finds that when Defendants' former attorney, John Peter Lee, withdrew from
5 this matter he provided a last known address for Defendant Zandian in San Diego, California.
6 Based upon this fact and other evidence in the record, the Court finds San Diego, California, is
7 an appropriate location for the debtor's examination of Defendant Reza Zandian.

8 NOW, THEREFORE, **IT HEREBY IS ORDERED** as follows:

9
10 1. That Defendant Reza Zandian is hereby ordered to appear in San Diego, California,
11 during the month of February 2016 and answer upon oath or affirmation concerning his
12 property at a Judgment Debtor Examination, with the specific location in San Diego to be
13 chosen by Plaintiff; and

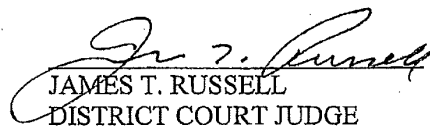
14 2. That Defendant Reza Zandian is hereby ordered to produce to Plaintiff's counsel on
15 or before December 21, 2015, all of the following information and documents identifying,
16 related to, and/or comprising the following:

- 17
18 a. Any and all information and documentation identifying real property, computers,
19 cell phones, intellectual property, vehicles, brokerage accounts, bank deposits and
20 all other assets that may be currently available for execution to satisfy the
21 Judgments entered by the Court, including, but not limited to, information relating
22 to financial accounts, monies owed to Defendant Zandian by others, etc.
23
24 b. Documents sufficient to show Zandian's balance sheet for each month from
25 December 11, 2009 (the date the original complaint was filed) to the present.
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27 c. Documents sufficient to show Zandian's gross revenues for each month from
28 December 11, 2009 to the present.

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- d. Documents sufficient to show Zandian's costs and expenses for each month from December 11, 2009 to the present.
- e. All tax returns filed by Zandian with any governmental body for the years 2010 to the present, including all schedules, W-2's and 1099's.
- f. All of Zandian's accounting records, computerized electronic and/or printed on paper format for the years 2010 to the present.
- g. All of Zandian's statements, cancelled checks and related banking documents for any bank, brokerage or other financial account at least partially controlled by Zandian, or recorded in the name of Zandian or for Zandian's benefit, from December 11, 2009 to the present.
- h. All of Zandian's checkbooks, checkbook stubs and checkbook entries from December 11, 2009 to the present.
- i. Documents sufficient to show the means and source of payment of Zandian's current residence and any other residence from December 11, 2009 to the present.
- j. Documents sufficient to show the means and source of payment of Zandian's counsel in this matter from December 11, 2009 to the present.
- k. Any settlement agreements by which another party has agreed to pay money to Zandian from December 11, 2009.

DATED: This 6th day of November, 2015.


JAMES T. RUSSELL
DISTRICT COURT JUDGE

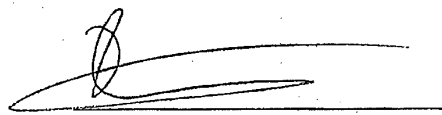
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CERTIFICATE OF MAILING

The undersigned, an employee of the First Judicial District Court, hereby certifies that on the 6th day of November, 2015, I served a copy of the foregoing Order by United States Mail, postage prepaid, addressed as follows:

Adam P. McMillen, Esq.
5371 Kietzke Lane
Reno, NV 89511

Severin A. Carlson, Esq.
Tara C. Zimmerman, Esq.
510 West Fourth Street
Carson City, NV 89703



Angela Jeffries
Judicial Assistant, Dept. 1

Exhibit 2

Exhibit 2

RÉPUBLIQUE FRANÇAISE
AUTORISATION PROVISOIRE DE SÉJOUR

PREFECTURE PREFECTURE DE POLICE
DOSSIER N° 10ST000000
ENTRÉE EN FRANCE 15/03/2012
NOM (M.) ZANDIAN JAZI
PRÉNOMS GHOLAN REZA
NÉ(E) LE 15/01/1952 A ISPAHAN
NATIONALITÉ IRANIENNE
ADRESSE 06 RUE EDOUARD FOURNIER
75116 PARIS

N° 9913081553



EST AUTORISÉ(E) A PROLONGER PROVISOIREMENT
SON SÉJOUR EN FRANCE JUSQU'AU 05/08/2015

CETTE AUTORISATION N'EST VALABLE QU'ACCOMPAGNÉE DU DOCUMENT
NO H95628481 VALABLE DU 05/07/2013 AU 05/07/2018
JUSTIFIANT DE L'IDENTITÉ DE SON TITULAIRE.

SIGNATURE
DU TITULAIRE

SIGNATURE ET CACHET
DE L'AUTORITÉ

Pour le Préfet de Police et par délégation
Le Directeur de la Police Générale

Cyrille MAILLET - M 1

FAIT A PARIS (CITE)
LE 06/05/2015

VALABLE JUSQU'AU 05/08/2015
02455778

CETTE AUTORISATION NE PERMET PAS A SON TITULAIRE D'OCCUPER UN EMPLOI

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